IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION III

No. 35034-7-III

STATE OF WASHINGTON, Respondent,

v.

TRAVIS LEE PADGETT, Appellant.

APPELLANT'S BRIEF

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I. INTRODUCTION

After his conviction and sentencing, Travis Padgett sought to obtain his client file and discovery materials to assist in preparing a personal restraint petition. When his former attorneys denied his repeated requests, he filed a motion to compel in the Yakima County Superior Court. The Superior Court denied his motion, holding that CrR 4.7 does not apply to matters on appeal. Padgett now appeals.

II. ASSIGNMENTS OF ERROR

ASSIGNMENT OF ERROR 1: The trial court erred in denying Padgett's motion to compel production of his client file and redacted discovery pursuant to RPC 1.16(d) and CrR 4.7(h)(3).

ASSIGNMENT OF ERROR 2: The trial court erred in denying Padgett's motion for lack of notice to his attorney when the record fails to establish that Padgett was represented by any attorney concerning the motion.

III. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

ISSUE 1: Is RPC 1.16(d)'s direction to turn over a client's file to the client at the conclusion of representation applicable to Padgett's request?

ISSUE 2: Under CrR 4.7(h)(3), is Padgett entitled to a copy of his discovery materials subject to appropriate redactions by the prosecuting attorney or the court?

ISSUE 3: When Padgett filed a *pro se* motion to obtain his discovery without providing notice to his appellate attorney, who had not appeared for him in the Superior Court, was the trial court justified in denying the motion on the grounds that Padgett failed to notify the attorney?

IV. STATEMENT OF THE CASE

Travis Padgett was convicted of multiple charges and sentenced to an exceptional term of confinement. *State v. Padgett*, 197 Wn. App. 1086, __ P.3d __, 2017 WL 888624 (Unpublished Op. March 2, 2017). Since approximately June 2015, Padgett sought to obtain a copy of his client file and the discovery materials in his case to review for use in a personal restraint petition. Supp. CP 29, 35. When those requests were not satisfied, Padgett filed, *pro se*, a motion to compel production of the file and discovery. Supp. CP 28. In support of his motion, he cited RPC 1.16(d) and CrR 4.7(h)(3). Supp. CP 29-30.

In support of his motion, he filed a declaration advising that he was represented by an appellate attorney for his direct appeal and was not represented by any other attorney in any other criminal matters. Supp. CP

34. Padgett also filed a declaration from a second attorney, who stated that he was appointed to review inconsistencies in the jury verdict following Padgett's conviction, and his motion to release the file to him had been opposed by Padgett's trial attorney and denied by the court. Supp. CP 37-38.

The Superior Court held a hearing on Padgett's motion on December 2, 2016. RP 1. Although Padgett had requested a hearing date at which he could appear telephonically, there is no record of any effort to permit his attendance and he was not present at the hearing. RP 3. The State opposed Padgett's motion on the grounds that it would be unable to control the discovery if it were allowed to be in Padgett's possession. RP 5. Padgett's former trial attorney also appeared at the hearing and expressed concern about communicating with Padgett because his appeal was still pending, stating that Padgett was represented by appellate counsel as well as another attorney from the Tri-Cities. RP 6-7.

In an oral ruling, the trial court expressed concern that the motion was not brought by appellate counsel, nor was appellate counsel given notice of the motion. RP 7. The court also indicated that it appeared the appellate proceeding was beyond the briefing stage, stating:

> There's no indication at all that he's attempting to file some type of a petition for review on his own behalf for personal restraint petition. There's nothing really that would substantiate any need for the discovery at this point in time. And it's not supported by counsel of record, counsel of record being Mr. Thompson, who's the last counsel of record and appellate counsel.

RP 7-8. Accordingly, the trial court denied Padgett's motion. RP 10.

In a written order, the court found that Padgett was represented by two attorneys who were not given notice of the hearing, and concluding that the court rule cited did not apply to matters on appeal. CP 2. The order did not address Padgett's arguments concerning RPC 1.16(d).

Subsequently, Padgett filed a motion for reconsideration in which he pointed out that his appointed counsel only represented him in his direct appeal, and that he needed the case file and discovery to assist in preparing a personal restraint petition under RAP 16.3. CP 13-14. The trial court again denied the motion and the motion for reconsideration, stating, "Defendant's reliance upon CrR 4.7(h)(3) is misplaced." CP 21, 22.

Padgett now appeals the denial of his motion, and has been found indigent for that purpose. CP 6-7[1], 8.

[1] Padgett's proposed findings of indigency and order apparently were not signed by the trial court. However, counsel has been appointed to represent Padgett in this appeal

V. ARGUMENT

Padgett sought to obtain his case file and discovery materials relating to his conviction for review and preparation of a personal restraint petition. Because he is entitled to the materials requested both under the applicable rules governing discovery and the Rules of Professional Conduct governing ownership of his file, and because the trial court was not justified in denying his motion on procedural grounds due to his failure to provide notice to attorneys who were not shown to have an interest in the motion, the order denying Padgett's motion was erroneous.

A. Padgett is entitled to a copy of the discovery materials under the plain language of CrR 4.7(h)(3).

Under the rules governing discovery in Superior Court criminal cases, materials provided in discovery must generally remain in the exclusive custody of the attorney and only used for purposes of conducting the party's case. CrR 4.7(h)(3). However, the rule also provides that "a defense attorney shall be permitted to provide a copy of the materials to the defendant after making appropriate redactions which are approved by the prosecuting authority or order of the court." *Id.* The

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through the Office of Public Defense, suggesting a determination of his indigency has been made by the appellate court. *See* RAP 15.2(g). His affidavit of indigency filed in support of his motion attests that he receives income of $47.50 per month from employment at Airway Heights Corrections Center, owns no assets, and owes approximately $2,000.00 to the Yakima County Superior Court. CP 3-5.

discovery rules also permit entering of protective orders affecting discovery for cause shown, and imposition of sanctions for failing to comply with an applicable discovery rule or order. CrR 4.7(h)(4), (7).

A trial court's rulings on discovery motions based on the court rules are reviewed for abuse of discretion, which occurs when the trial court makes its decisions based on untenable grounds or for untenable reasons. *State v. Vance*, 184 Wn. App. 902, 911, 339 P.3d 245 (2014). In interpreting the requirements of a court rule, the courts apply ordinary principles of statutory construction, looking first to the plain language of the rule. *City of Seattle v. Holifield*, 170 Wn.2d 320, 327, 240 P.3d 1162 (2010). It is well established that use of the word "shall" imposes a mandatory requirement, unless a contrary intent is apparent. *State v. Gonzales*, 198 Wn. App. 151, 155, 392 P.3d 1158 (2017).

Applying these principles, the plain language of CrR 4.7(h)(3) requires the court to permit the defense attorney to provide a copy of the discovery to the defendant, subject to appropriate redactions. This rule arises at least in part from due process considerations, as access to evidence is a crucial element of the right to a fair trial. *State v. Grenning*, 169 Wn.2d 47, 58, 234 P.3d 169 (2010). Denying the defendant access to the evidence imposes "an impossible burden on the defendant since the

defendant could only speculate what exculpatory evidence it might reveal." *Id.*

These concerns are not lessened when the defendant wishes to evaluate grounds for post-conviction review. Because grounds for relief include constitutional deprivations as well as material facts that have not been previously presented, review of the discovery materials is generally critical to evaluating the effectiveness of trial counsel in investigating the case and raising or preserving potential challenges to the State's acquisition of evidence. RAP 16.4(c)(2), (3). The petitioner must also present the evidence supporting its factual allegations. RAP 16.7(a)(2). Thus, denying a post-conviction petitioner access to the underlying discovery materials imposes the same kinds of unfair burdens that raise due process concerns by requiring him to present the evidence supporting his claim of error while simultaneously preventing him from obtaining it. Without access to the discovery, a defendant will probably never find out if his attorney failed to interview an exculpatory witness, or move to suppress unlawfully obtained evidence, nor would he be able to show the deficiency without demonstrating to the court how the error was apparent in the discovery materials and should have alerted trial counsel to the need to act.

Nothing in the rule terminates the mandatory obligation to provide an appropriately redacted copy of the discovery materials to the defendant after conviction. To the contrary, the rules are to be interpreted "to provide for the just determination of every criminal proceeding." CrR 1.2. CrR 4.7(h)(3) contains no temporally limiting language suggesting that the obligation to provide a copy of materials relating to the case is terminated once judgment is entered. Where discovery materials are provided in a criminal case pursuant to the court rules, and the defendant requires the materials for use in post-conviction review of the same case, fairness demands that the requested copy be provided. The State's concerns about control over and dissemination of the discovery materials can be adequately addressed by redacting sensitive information, requesting an appropriate protective order, or seeking sanctions for inappropriate use of the materials. The concerns do not warrant depriving the defendant of the documentation he needs to evaluate and substantiate his claim for relief.

Because CrR 4.7(h)(3) governs the discovery materials provided in Padgett's case and his right to a copy of them, the trial court erred in concluding that he was not entitled to a copy of the discovery under the rule. As such, its ruling denying his motion was based upon untenable reasons and constituted an abuse of discretion. The order denying the motion should, therefore, be reversed.

B. Padgett is the owner of his client file under RPC 1.16(d) and is entitled to receive it.

Furthermore, the trial court entirely failed to address Padgett's arguments under RPC 1.16(d). Under that rule, Padgett is the owner of his file and his former attorney was ethically required to take reasonably practicable steps to protect his interests, including returning the file to him. Because Padgett was entitled to the file, including the appropriately redacted discovery materials, the trial court erred in denying his motion to obtain it.

The Washington State Bar Association examined the requirements of RPC 1.16 in an advisory opinion issued in 1987. Under that opinion, a client is generally entitled to the entire client file upon termination of representation. WSBA Formal Ethics Opinion 181, at 2-3 (1987), *attached hereto* as Appendix A. While this obligation is superseded by legal obligations that limit the distribution of documents in the file, such as CrR 4.7(h)(3)'s restriction on the custody of discovery materials, the rule also requires reasonably practicable action to protect the client's interests. *Id.* at 3. Where CrR 4.7(h)(3) provides a mandatory obligation to provide redacted copies of the materials to the defendant, counsel's professional responsibility upon receipt of a request for the file and

discovery materials includes an effort to obtain the required permission from the prosecuting attorney or the court order permitting the copy to be provided. *See also* RPC 1.15A(g) (when lawyer possesses property in which there are competing interests, lawyer "must take reasonable action to resolve the dispute.").

"A superior court has the authority and duty to see to the ethical conduct of lawyers in proceedings before it." *State v. Sanchez*, 171 Wn. App. 518, 546, 288 P.3d 351 (2012). Here, the required ethical conduct of Padgett's trial counsel included returning the client file to Padgett, at his request. Apart from the discovery materials, dissemination of which is governed by the court rule, Padgett was entitled to receive the entire file, including the notes and records relating to his representation, subject only to specific limitations for materials that are unlikely to cause prejudice if withheld, such as drafts of documents, duplicate copies, or notes about the lawyer's personal impressions of identifiable persons. WSBA Formal Ethics Opinion, *supra*, at 3. The trial court accordingly erred in denying his motion for his file under RPC 1.16(d).

Finally, these identical considerations have already been raised and considered by Division II of the Court of Appeals in an unpublished opinion in *State v. Chargualaf*, 182 Wn. App. 1058, __ P.3d __, 2014 WL

3942086 (2014).[2] Although unbinding, the reasoning of the case is persuasive and should be followed. As in this case, *Chargualaf* concerned a post-judgment motion for a copy of his discovery and case-related files. *Id.* at 1. The court in that case determined that under RPC 1.16(d), the defendant had a right to his file excepting materials that should be withheld under CrR 4.7(h)(3) and the trial court erred in denying his motion to obtain those materials. *Id.* at 1-2. Accordingly, the *Chargualaf* court reversed the order and remanded the case for further proceedings. *Id.* at 2.

The present case is indistinguishable from *Chargualaf* in every material respect. Padgett properly requested his file, to which he was entitled under RPC 1.16(d). To the extent the discovery cannot be summarily provided in response his request, CrR 4.7(h)(3) requires it to be provided to him with appropriate redactions. Because he was entitled to the materials, it was error to deny his motion to obtain them. Accordingly, the order should be reversed and the case remanded.

[2] Under GR 14.1(a), unpublished opinions of the Court of Appeals filed after March 1, 2013, may be cited as nonbinding authority and accorded such persuasive value as the court deems appropriate.

C. There was no showing that Padgett was represented by another attorney concerning the pending motion that warranted denying the motion for failure of notice.

Lastly, the trial court denied Padgett's motion because he did not give notice to his appellate attorney or to "Robert Thompson." CP 2. But because neither attorney represented Padgett on the motion or had an interest in it, notice to them was not required. Accordingly, it was error to deny Padgett's motion on these grounds.

Service in Superior Court criminal proceedings is governed by CR 5. CrR 8.4. CR 5(a) provides that all written motions and notices "shall be served upon each of the parties." The parties to Padgett's motion were himself, the State, and his former trial counsel. Padgett's representation by counsel in a separate proceeding in the Court of Appeals has no bearing on his pursuit of post-judgment relief in the Superior Court. Moreover, his sworn statement to the court that he was representing himself *pro se* on the pending motion was uncontroverted by any contrary evidence, and nothing in the record supports the trial court's conclusion that the motion was within the scope of representation of any other lawyer involved with Padgett's case.

Because Padgett properly notified the parties with an interest in the pending motion, both of whom attended the hearing, it was error for the trial court to deny it for failing to give notice to persons who did not have any interest of record. Proper notice was given, and the order denying Padgett's motion should be reversed.

D. The court should decline to impose appellate costs if Padgett does not prevail on appeal.

Pursuant to the General Court Order dated June 10, 2016 and Title 17 of the Rules on Appeal, Padgett respectfully requests that due to his continued indigency, the court should decline to impose appellate costs in the event he does not prevail. His report as to continued indigency is filed contemporaneously with this brief and shows that he lacks assets, obtains income of only about $50.00 per month from work in prison, and owes outstanding legal financial obligations. He is serving an exceptional sentence of 360 months. *Padgett*, 2017 WL 888624 at 3.

In *State v. Blazina*, 182 Wn.2d 827, 835, 344 P.3d 680 (2015), the Washington Supreme Court responded to growing national attention to the societal burdens associated with imposing unpayable legal financial obligations on indigent defendants, including "increased difficulty in reentering society, the doubtful recoupment of money by the government,

and inequities in administration." Under Washington's system, unpaid obligations accrue interest at 12% per annum and can be subject to collection fees, creating the perverse outcome that impoverished defendants who pay only $25 per month toward their obligations will, on average, owe more after ten years than at the time of the initial assessment. *Id.* at 836. As a result, unpaid financial obligations can become a burden on gaining (and keeping) employment, housing, and credit rating, and increase the chances of recidivism. *Id.* at 837.

The Court of Appeals has recognized that in the absence of information from the State showing a change in the appellant's financial circumstances, an award of appellate costs on an indigent appellant may not be appropriate. *State v. Sinclair*, 192 Wn. App. 380, 393, 367 P.3d 612, *review denied*, 185 Wn.2d 1034 (2016). Once an appellant is found indigent, the presumption of indigence continues throughout review. RAP 15.2(f). The Supreme Court has additionally recognized that application of RAP 14.2 should "allocate appellate costs in a fair and equitable manner depending on the realities of the case." *State v. Stump*, 185 Wn.2d 454, 461, 374 P.3d 89 (2016).

Lastly, the Washington Supreme Court recently amended RAP 14.2 to provide that costs should not be imposed if the commissioner

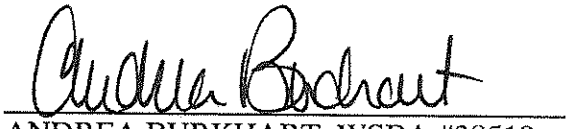
determines the offender does not have the current or likely future ability to pay such costs. When the offender has been found indigent for appeal, that presumption continues unless the commissioner determines that the offender's financial circumstances have significantly improved since the last determination of indigency. Because Padgett has been found indigent for this appeal, it is presumed he is unable to pay an appellate cost award unless the State presents evidence of a significant improvement in his financial condition.

Under these circumstances, this court should exercise its discretion under RAP 14.2 to decline to impose appellate costs. Padgett has been has complied with this court's General Order. Under the *Sinclair* standard as well as revised RAP 14.2, an appellate cost award is inappropriate in this case.

VI. CONCLUSION

For the foregoing reasons, Padgett respectfully requests that the court REVERSE the order denying his motion to provide him with his client file and discovery, and REMAND the case for further proceedings.

RESPECTFULLY SUBMITTED this 19 day of September, 2017.



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DECLARATION OF SERVICE

I, the undersigned, hereby declare that on this date, I caused to be served a true and correct copy of Appellant's Brief upon the following parties in interest by depositing them in the U.S. Mail, first-class, postage pre-paid, addressed as follows:

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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed this 19 day of September, 2017 in Walla Walla, Washington.

Breanna Eng

APPENDIX

WSBA

Opinion: 181
Year Issued: 1987
RPC(s): 1.16
Subject: Asserting Possessory Lien Rights and Responding to Former Client's Request for Files

At the conclusion of the representation of a client, the client often requests a copy of the "file." If the lawyer's fees remain unpaid, the lawyer may want to assert lien rights. If no lien rights are claimed, a question often arises as to what parts of the file must be provided and whether the lawyer can charge the client for the expense of copying the file. The Rules of Professional Conduct shed light on both questions.

I. The attorney's possessory lien.

A. Issue: What are the ethical limitations on a lawyer's right to assert a lien on the papers or money of a client or former client?

B. Conclusion: A lawyer cannot exercise the right to assert a lien against files and papers when withholding these documents would materially interfere with the client's subsequent legal representation. Nor can the lien be asserted against monies held in trust by the lawyer for a specific purpose or subject to a valid claim by a third party.

C. Discussion: Attorneys have a "retaining" or a "possessory" lien under RCW 60.40.010 against papers or money in the lawyer's possession. In contrast to a "charging" lien under RCW 60.40.010(4) on a judgment obtained for a client, the retaining lien on papers or money cannot be foreclosed. Ross v. Scannell, 97 Wn.2d 598, 647 P.2d 1004 (1982). The lien "may merely be used to embarrass the client, or, as some cases express it to 'worry' him into the payment of the charges." Gottstein v. Harrington, 25 Wash. 508, 511, 65 P. 753 (1901).

The client, however, retains an absolute right, in civil cases at least, to terminate the lawyer at any time for any reason, or for no reason at all. RPC 1.16(a)(3); Belli v. Shaw, 98 Wn.2d 569, 657 P.2d 315 (1983). Upon termination of the relationship, RPC 1.16(d) requires that:

A lawyer shall take steps to the extent reasonably practicable to protect a client's interests, such as . . . surrendering papers and property to which the client is entitled. . . . The lawyer may retain papers relating to the client to the extent permitted by other law.

If assertion of the lien would prejudice the former client, the duty to protect the former client's interests supersedes the right to assert the lien.

A client's need for the files will almost always be presumed from the request for the files. But this need does not mean that in every case the assertion of a lien will prejudice the client. If there is no dispute about fees

and the client has the ability to pay the outstanding charges, it is proper for the lawyer to assert the lien. In this situation, it is the former client's refusal to pay that will cause any injury. When, however, there is a dispute about the amount owed, or the client does not have the ability to pay, the lawyer cannot assert lien rights if there is any possibility of interference with the former client's effective self-representation or representation by a new lawyer.

The right to assert the lien against funds of the client in the lawyer's control is also limited. For example, a lawyer may not assert a lien against monies which constitute, or which have been commingled with, child support payments. Fuqua v. Fuqua, 88 Wn.2d 100, 558 P.2d 801 (1977). Similarly, if a lawyer accepts funds from a client for a specific purpose, such as for posting a bond or paying a court imposed penalty, the failure to use the funds for the agreed purpose may constitute misrepresentation, failure to carry out a contract of employment, or failure to properly handle client funds. See, e.g., In re McMurray, 99 Wn.2d 920, 665 P.2d 1352 (1983). Funds held by a lawyer over which a third party has an enforceable lien may not be subject to the attorney's possessory lien. See, e.g., Department of Labor and Industries v. Dillon, 28 Wn. App. 853, 626 P.2d 1004 (1981). When the funds are not held in trust for a specific purpose or subject to a valid claim by a third party, the lawyer may hold the funds subject to the lien even though the client may direct that the funds be transferred to a new attorney and claim that a refusal to transfer will prevent the client from obtaining effective representation.

If there is a dispute about the amount of fees owed, the prudent course would be for the lawyer to immediately institute court action to resolve the issue, to limit the lien to the undisputed amount, and to release the balance of funds.

Since the retaining or possessory lien cannot be foreclosed, any funds held pursuant to the lien must be held in the lawyer's trust account. The lawyer can apply those funds against what is owed only by obtaining a judgment against the client and enforcing the judgment by the normal judgment enforcement processes.

II. Responding to a former client's request for files

A. Issue: When a former client requests the file and no lien is asserted, what copying costs can a lawyer charge and what papers and files must be delivered?

B. Conclusion: At the conclusion of a representation, unless there is an express agreement to the contrary, the file generated in the course of representation, with limited exceptions, must be turned over to the client at the client's request, and if the lawyer wishes to retain copies for the lawyer's use, the copies must be made at the lawyer's expense.

C. Discussion: In analyzing this question a lawyer's file assembled in the course of representing a client can be broken down as follows:

(a) Client's papers—the actual documents the client gave to the lawyer or papers, such as medical records, the lawyer has acquired at the client's expense.

(b) Documents the disposition of which is controlled by a protective order or other obligation of confidentiality;

(c) Miscellaneous material that would be of no value to the client; and

(d) The balance of the file, including documents stored electronically.

Client's papers—the actual documents the client caused to be delivered to the lawyer or papers, such as medical records that the lawyer has acquired at the client's expense—must be returned to the client on the termination of the representation at the client's request unless a lien is asserted. If the lawyer wants to retain copies, the lawyer must bear the copying expense, and would hold the copies subject to the duty of confidentiality imposed by RPC 1.6.

Aside from principles of ownership, RPC 1.16(d) requires the lawyer, upon termination of representation, to take steps to the extent reasonably practical to protect a client's interests including surrendering papers and property to which the client is entitled. Subject to limited exceptions, this Rule obligates the lawyer to deliver the file to client. If the lawyer wants to retain copies for the lawyer's own use, the lawyer must pay for the copies.

While the client's interests must be the lawyer's foremost concern, if the lawyer can reasonably conclude that withholding certain papers will not prejudice the client, the lawyer may withhold those papers. Examples of papers the withholding of which would not prejudice the client would be drafts of papers, duplicate copies, photocopies of research material, and lawyers' personal notes containing subjective impressions such as comments about identifiable persons.

A protective order or confidentiality obligation that limits the distribution of documents or specifies the manner of their disposition may supersede a conflicting demand of a former client.

The lawyer and client can make an arrangement different from that outlined above. A lawyer and client could agree that the files to be generated or accumulated will belong to the lawyer and that the client will have to pay for all copies sent to the client. Similarly, if the client wishes the lawyer to retain copies it would be appropriate to charge the copying expense to the client.

[amended 2009]

Advisory Opinions are provided for the education of the Bar and reflect the opinion of the Committee on Professional Ethics (CPE) or its predecessor, the Rules of Professional Conduct Committee. Advisory Opinions issued by the CPE are distinguished from earlier RPC Committee opinions by a numbering format which includes the year followed by a sequential number. Advisory Opinions are provided pursuant to the authorization granted by the Board of Governors, but are not individually approved by the Board and do not reflect the official position of the Bar association. Laws other than the Washington State Rules of Professional Conduct may apply to the inquiry. The Committee's answer does not include or opine about any other applicable law other than the meaning of the Rules of Professional Conduct.

BURKHART & BURKHART, PLLC

September 19, 2017 - 2:33 PM

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